

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
(Miami Division)

WORLD MEDIA ALLIANCE LABEL
INC.
(Florida corporation)

Plaintiffs,

v.

BELIEVE SAS, aka BELIEVE Co. aka
BELIEVE aka BELIEVE DIGITAL
(French company)

YOUTUBE LLC
(Delaware company);

GOOGLE LLC
(Delaware company)

Defendants.

ACTION No.

VERIFIED COMPLAINT

**FOR INJUNCTIVE RELIEF
AND DAMAGES**

NATURE OF ACTION.

A Florida corporation brought this action after its intellectual property assets were infringed, usurped, and attacked by a French company via YOUTUBE and other media. The plaintiffs are asking for injunctive relief and damages. The Court has the jurisdiction and power to order that said the Florida corporation's rights had been violated and enforce those rights according to 17 U.S.C. Chapter 5. The subject matter of the lawsuit is property rights/copyrights, seeking to terminate copyright infringement and award damages. A copyright infringer may be subject to civil remedies. The copyright holder is entitled to seek monetary damages and profits, attorneys' fees, and an injunction enforceable in a U.S. District Court. That is not the first instance

of litigation in the U.S. against BELIEVE. That French company has been accused of copyright trolling, particularly on YOUTUBE, where it has been alleged to engage in claiming copyright for works that are either copyright free or that they do not own the rights to. For example, that French company was the subject of a New York federal lawsuit alleging they were behind large-scale, willful copyright infringement. In that previous instance, BELIEVE was sued in New York by an American music publisher Round Hill Music, at 650 Fifth Ave., Ste 1420, New York, NY, 10019. That other aggrieved American party has been suing BELIEVE for the willful publishing, without the lawful right to do so, of 219 works while infringing copyright, stating a claim for \$150,000 for each of the allegedly infringed works, or \$32.85 million. In this matter, WMA complains that BELIEVE has infringed copyrights for at least 44 works and YOUTUBE for 25 works, posting audio and video recordings on the Internet without copyright, license, or permission. The maximum recovery allowed by the statutes is \$250,000 per violation. By way of that previous precedent in New York and the statutes' limitations, WMA states a claim against BELIEVE for \$11,000,000.

A. PARTIES.

1. Plaintiff WORLD MEDIA ALLIANCE LABEL INC. (also WMA) is a Florida corporation, State docket 18000058641, FEI/EIN Number 83-1113407. WMA was incorporated on July 3, 2018. WMA's principal and registered address is 16711 Collins Ave #507, Sunny Isles Beach, FL 33160. WMA's executives are George Sergeev, the President and Chief Executive Officer, and Ivan Sergeev, Vice President. As relevant here, WMA owns the rights to use the materials listed below. WMA has contractual rights with the artists and musical group called Tender May (founded in 1986) and its leader Andrei Razin, which was the origin of the audio and

video works to which copyright enforcement applies. The copyright registration with the U.S. Patent and Trademark Office is annexed in Exhibit 1 to the Complaint.

2. Defendant BELIEVE SAS (Société par actions simplifiée SAS; English: simplified joint-stock company) aka BELIEVE, aka BELIEVE DIGITAL (hereinafter also BELIEVE), is a French type of business entity registered in France, registration No. 81625853. Denis Ladegaillerie, Arnaud Chiaramonti, and Nicolas Laclias. BELIEVE was incorporated on April 7, 2005. Its registered address is 24 Rue Toulouse Lautrec 75017, Paris, France. The main office appears at 2 Place du Colonel Fabien, 6 Avenue Mathurin Moreau, Paris, 75019, France. The company presents itself online and is generally known as BELIEVE. According to public information, its revenues have surpassed \$580 million a year. BELIEVE undertook 300 million Euros initial offering in Paris in or about 2021. That company was previously known as BELIEVE DIGITAL. It is the first hybrid entity enacted under French law and based on common law principles. BELIEVE has been sued in the United States on similar claims of copyright infringement that may establish a pattern of conduct of BELIEVE.

3. Defendant YOUTUBE LLC (YOUTUBE) is a Delaware company, organized in 2006, with main offices in California, at the address: 901 Cherry Ave, San Bruno, CA 94066. YOUTUBE, a subsidiary of GOOGLE LLC, is a leading worldwide video platform for the mass audience. YOUTUBE is a defendant in this action because, despite its editorial policies and content monitoring, it has failed to enforce copyrights belonging to WMA. Then YOUTUBE's representative ignored the repeated requests from WMA's principals to delete videos that BELIEVE has posted on its web platform as though BELIEVE had assumably copyright, which was false.

4. Defendant GOOGLE LLC (GOOGLE) is a Delaware company registered in 1998, with main offices in California, at 1600 Amphitheatre Parkway, Mountain View, CA. GOOGLE acquired YOUTUBE in 2006. GOOGLE has controlled YOUTUBE's content on the Internet and has exercised its managerial decision-making regarding undesirable content on the Internet, particularly posted through YOUTUBE. Despite the applicable editorial guidelines, GOOGLE is the defendant in this action as the parent of YOUTUBE, controlling its activities on the Internet.

B. JURISDICTION AND VENUE.

5. Jurisdiction is proper. WMA is a Florida corporation. Two French company, BELIEVE, has no registration in Florida. YOUTUBE and GOOGLE are Delaware companies, with their main headquarters in California.

6. The diversity of citizenship applies where a claim exceeds the statutory minimum, pursuant to 28 U.S.C. §1332.

7. The venue is proper because WMA, a Florida corporation, has copyright, and infringement of their rights has effect in Florida, where WMA is deprived of a portion of their revenues. WMA's registered and operating office is in Sunny Isles Beach, Florida, where the jurisdiction of the U.S. District Court for the Southern District of Florida, Miami Division, is proper.

C. FACTS RELEVANT TO ALL COUNTS.

8. Upon the contracts with the performers at the Russian musical group called Tender May (Laskovy May or Ласковый Май) and its affiliates have secured Registrations in USA Copyright Office, Master Right Owner, Trademark: Tender May (In Cyrillic transcription Ласковый май), Andrei Razin (Андрей Разин), Reg, No.6.625.844 Certificate of Registration PA 2-320-513, PA 2-332- 534, PA 2-348- 087, PA 2-411-609.

9. WMA has obtained the copyright from the originators of the artistic work according to legal, contractual agreements and holds those in its own right, as certified in the USA.

10. By way of background, Tender May ("Ласковый май" also abbreviated "TM") is a cult Soviet and Russian pop group founded in Orenburg, which became associated with Andrei Razin, a singer, composer, manager, and producer of the group, that he funded it until it became popular and self-supporting. The founding day of the group is December 6, 1988. The members of the group were pupils of the Orenburg orphanage in Russia. After meeting producer Andrei Razin (also brought up in an orphanage), Tender May moved to Moscow. The most famous song of "Tender May" was "White Roses," which was in the top ten of the charts in the former Soviet Union for several years.

11. Tender May's genres fall under Eurodisco, tin pop, and synthpop categories. The first teenage musical group in the Soviet Union, which worked in the style of "Euro-disco of the 80s" and appealed to young people aged from 13 to 18, had unprecedented popularity in the USSR, then in Russian and other Republics that were previously part of the USSR, with both the young audience of the country and the adult.

12. At its peak in the late 1980s, Tender May was able to gather stadiums of many thousands (40-60 thousand people) and set records for the number of concerts per day. Tender May was arguably, the most popular musical group in the former USSR then; later, its popularity continued in Russia.

13. Andrei Razin (Razin), the producer and the leader of the group since 1988, graduated from the East Siberian Academy of Culture and Arts and Stavropol State University. Razin has a Ph.D. in economics. In 1985 he first appeared on television as a singer. From 1988 to 1991, Razin was General Director of the All-Union Central Creative Studio of the Ministry of

Culture of the USSR for gifted orphans. In 1993, Razin became the Stavropol Institute of Contemporary Arts rector at the Stavropol State University in Russia.

14. As a producer, composer, singer, and manager, Razin was the driving force behind the success of Tender May.

15. In 2009, on the wave of a new round of popularity associated with the fashion of the 1980s and the release of the film Tender May, the group reappeared on the stage with Razin and three more musicians.

16. Razin, the group leader, is affiliated with WMA under contracts, and WMA currently holds the copyright to Tender May's audio and video recordings.

17. At no time did Tender May or Razin have anything to do with BELIEVE, its predecessors, or affiliates in France. The activities of BELIEVE concerning Tender May and Razin, apart from the statutory description provided below, can be commonly described as copyright piracy for commercial gain through YOUTUBE, GOOGLE, and other means.

18. The copyright to the artistic works in question, held by WMA, is controlled, in addition to contractual terms with the artists and their musical group, by the terms of the Digital Millennium Copyright Act (DMCA), and the information is located at <https://dmca.copyright.gov/>.

19. Under the controlling terms, WMA is the designated copyright agent for Tender May and Razin.

20. The U.S. Patent and Trademark Office maintains WMA's registration as follows: Reg. No. 6,625,844, registered Jan. 25, 2022, Int. Cl.: 9, Trademark, Principal Register World Media Alliance Label, Inc. (Florida corporation), 16711 Collins Ave., #507, Sunny Isles Beach, FLORIDA 33160, CLASS 9: Audio and video recordings featuring music and musical performances; downloadable musical sound recordings; downloadable musical video recordings;

downloadable photographs; downloadable ring tones and graphics for mobile phones and computers, First use 1-1-1986; in commerce 10-8-2013. The mark consists of Cyrillic characters, Ласковый май. The non-Latin characters in the mark transliterate to Laskovyi May, and this means⁶ Tender May in English. SER. NO. 90-356,475, filed 12-03-2020. See Exhibit 1 to the Complaint.

21. Following the description on the government's website cited above, the DMC provides safe harbors from copyright infringement liability for online service providers.

22. In order to qualify for safe harbor protection, certain kinds of service providers—for example, those that allow users to post or store material on their systems and search engines, directories, and other information location tools—must designate an agent to receive notifications of claimed copyright infringement. To designate an agent, a service provider must do two things: (1) make certain contact information for the agent available to the public on its website; and (2) provide the same information to the Copyright Office, which maintains a centralized online directory of designated agent contact information for public use. The service provider must also ensure that this information is up to date. That office has maintained an online registration system and electronically generated directory.

23. WMA is registered as the copyright holder in the above-cited government-sponsored directory. The directory is available to anyone worldwide, including in France, where BELIEVE has been active.

24. In particular, WMA is the copyright owner, the exclusive licensee of the copyrights in the following works and performing works, as well as works of video performing arts created by Tender May and Razin, from the 'Star, All Hits' album: 1. I am frank only with the moon. 02. Stupid snowflakes. 03. Everything is over. 04. Everything. 05. Melting snow. 06. Well, what are

you? 07. Gray night. 08. Summer. 09. I don't want to. 10. All in vain. 11. Adults. 12. Snowstorm in a strange city. 13. It's all over. 14. Rain. 15. Pink evening. 16. Telephone romance. 17. Month of July. 18. Let it be night. 19. Autumn Park. 20. For you. 21. Early departed autumn. 22. Homeless dog. 23. You just were. 24. And me. 25. Old forest.

25. BELIEVE listed using YOUTUBE at <https://www.youtube.com/> the following works, infringing copyright Owner's copyrights in the Works. The list of the works that are presented in the name of, or under the auspices of, BELIEVE includes the following:

1. https://www.youtube.com/watch?v=_VJYsPRk4fg
2. <https://www.youtube.com/watch?v=lEY9JPmcu4M>
3. <https://www.youtube.com/watch?v=dHogPsuhqxE>
4. <https://www.youtube.com/watch?v=FR-GU7g2fKA>
5. <https://www.youtube.com/watch?v=sC5x-6HxRe0>
6. https://www.youtube.com/watch?v=Em4ku-Zp8_U
7. <https://www.youtube.com/watch?v=qnSoSg3SDbo>
8. <https://www.youtube.com/watch?v=duwAzrbmwfY>
9. <https://www.youtube.com/watch?v=smW64Tc4ydE>
10. <https://www.youtube.com/watch?v=70mFzILBQtI>
11. <https://www.youtube.com/watch?v=aJkZhrFpwAc>
12. <https://www.youtube.com/watch?v=M7qh9b1nzpI>
13. <https://www.youtube.com/watch?v=QtWI8pzYF4k>
14. <https://www.youtube.com/watch?v=i-S0jmmoias>
15. https://www.youtube.com/watch?v=_i6aI7exfXw
16. <https://www.youtube.com/watch?v=vNp77hzm-bg>

17. <https://www.youtube.com/watch?v=EMoKyk80lzM&t=2s>
18. <https://www.youtube.com/watch?v=lCmuUau04Pw>
19. <https://www.youtube.com/watch?v=oCGeaWqLtZY>
20. <https://www.youtube.com/watch?v=ZHZZjQbiVvOk>
21. <https://www.youtube.com/watch?v=e5sG2FWa9EQ>
22. <https://www.youtube.com/watch?v=SCHEGETzXyg>
23. <https://www.youtube.com/watch?v=hyXMMX8wXqo>
24. <https://www.youtube.com/watch?v=kHquuYivzH4>
25. <https://www.youtube.com/watch?v=MF73YDkqtWA>
26. <https://www.youtube.com/watch?v=Yo9CQQ1FNco>
27. https://www.youtube.com/watch?v=_PwXBqjg-Pw
28. <https://www.youtube.com/watch?v=5iz-OOPjfu0>
29. <https://www.youtube.com/watch?v=5cdlwQmbyw4>
30. <https://www.youtube.com/watch?v=xMq2iTOnqBs>
31. <https://www.youtube.com/watch?v=gIvQlIebrk4>
32. <https://www.youtube.com/watch?v=CpkUFdgCIr4>
33. <https://www.youtube.com/watch?v=RHV0eB6dKeY>
34. <https://www.youtube.com/watch?v=VC3sNn0IWgU>
35. https://www.youtube.com/watch?v=yMB_-tTOB4w
36. <https://www.youtube.com/watch?v=UGxFzKEc4Ug>
37. <https://www.youtube.com/watch?v=zwGrqZMjwfY>
38. <https://www.youtube.com/watch?v=S-ggho7jcdY>
39. <https://www.youtube.com/watch?v=mHKiFYWwgc4>

40. <https://www.youtube.com/watch?v=O-lilmwaWCE>

41. <https://www.youtube.com/watch?v=4NflsW3iyiE>

42. https://www.youtube.com/watch?v=XSo9rO_ilug

43. https://www.youtube.com/watch?v=_ppI0rSx2OM

44. <https://www.youtube.com/watch?v=awOgS8mUFog>

26. The names of the songs appearing under the above links contain 01. Gray night. 02. White roses. 03. White roses. 04. Gray night. 05. White roses. 06. Pink evening. 07. Gray night. 08. Gray night. 09. Pink evening. 10. Gray night. 11. Pink evening. 12. White roses. 13. Pink evening. 14. Gray night. 15. White roses. 16. Melting snow. 17. Cold winter evening. 18. Gray night. 19. White roses. 20. Pink evening. 21. White roses. 22. Gray night. 23. White roses. 24. Stupid snowflakes. 25. Gray night. 26. White roses. 27. Gray night. 28. White roses. 29. I am frank only with the moon. 30. Stupid snowflakes. 31. White roses. 32. Gray night. 33. White roses. 34. Gray night. 35. White roses. 36. Pink evening. 37. Autumn is slowly leaving. 38. I am frank only with the moon. 39. Summer. 40. Autumn is slowly leaving. 41. Melting snow. 42. Autumn is slowly leaving. 43. Gray night. 44. Stupid snowflakes.

27. The disclaimer is made that some of the above URL links become inactivated from time to time. However, after a certain period, those get activated again.

28. WMA is of the position that such tactics of partial and temporary compliance are used by BELIEVE to derail the lawsuits against it, yet achieving the same commercial results. Simply put, such unauthorized use of copyright materials could be called online piracy.

29. The following is a list of the URLs at which the Works are accessible on the Internet, via YOUTUBE, not attributed to BELIEVE or any other legal entity:

1. <https://www.youtube.com/watch?v=8dS-gD7zbL0>

2. <https://www.youtube.com/watch?v=Z9Pi7yKz4ac>
3. <https://www.youtube.com/watch?v=Sr3avG3wmH0>
4. https://www.youtube.com/watch?v=GNgAP0W_RZ4
5. <https://www.youtube.com/watch?v=H3H6v-J9YKU>
6. <https://www.youtube.com/watch?v=0qN1Jlm5kUk>
7. <https://www.youtube.com/watch?v=7JlIet8pdEE>
8. <https://www.youtube.com/watch?v=bNgZoDwPdIE>
9. <https://www.youtube.com/watch?v=hhKEQ-Gdegc>
10. https://www.youtube.com/watch?v=434urDGS9_k
11. https://www.youtube.com/watch?v=xh5lND1_b9o
12. <https://www.youtube.com/watch?v=cthnB1UfjLQ>
13. <https://www.youtube.com/watch?v=Sr3avG3wmH0>
14. <https://www.youtube.com/watch?v=Y1tawvU5hsY>
15. <https://www.youtube.com/watch?v=KxUlr9XuEWc>
16. <https://www.youtube.com/watch?v=uZxWJRFIsvg>
17. <https://www.youtube.com/watch?v=TYPDLUtpN2k>
18. https://www.youtube.com/watch?v=m5_u-b2jluM
19. https://www.youtube.com/watch?v=d6rDQ_EEA2c
20. <https://www.youtube.com/watch?v=WhEhCk2nMgw>
21. <https://www.youtube.com/watch?v=yWM3-hJppms>
22. <https://www.youtube.com/watch?v=922i6xGUFDk>
23. <https://www.youtube.com/watch?v=QGheYIQqkCE>
24. https://www.youtube.com/watch?v=_QfZbVvk5TQk

25. <https://www.youtube.com/watch?v=vEYtDW7YAqs>

30. As cited above, the infringing party is BELIEVE for the list of the first 44 links and YOUTUBE for a supplemental list of 25 links. However, YOUTUBE is ultimately in complete control of any of these online publications appearing under the domain www.youtube.com.

31. According to public information, BELIEVE is active and has locations in 44 countries. However, nothing is known whether that includes any office in the United States.

32. On information and belief, despite diligent search, no operative office of BELIEVE could be located in the U.S. To the extent BELIEVE that it has a presence in the USA, that claim is not supported by evidence.

33. The key people at BELIEVE are currently Denis Ladegallerie (Chief Executive Officer); Romain Vivien (Board member and Managing Director); Xavier Dumont (Director General); Marie-Anne Robert (Global Head of Artist Services), associated with the Paris office of BELIEVE.

34. BELIEVE claims that it specializes in music publishing and music distribution. According to Wikipedia, BELIEVE currently has 2730 employees. Its website is <http://believe.com>.

35. As mentioned above, BELIEVE is a defendant in a lawsuit brought by a music publishing firm in New York, accusing BELIEVE of violating copyright concerning 219 artistic works.

36. According to public information, in 2021, BELIEVE generated \$682 million in annual revenues.

37. BELIEVE's continuing to infringe WMA's copyright for 44 artistic works listed above entitles the aggrieved plaintiffs, WMA, to seek injunctive relief and damages in this action.

38. According to public information, BELIEVE raised €300m (Euros) in Paris IPO, giving TuneCore owner a market cap of €1.9bn. Reference: *Music Business Worldwide*. 2021-06-09.

39. Since early 2021, WMA sent to BELIEVE over ten separate warnings, objections, letters and demands to take from its platform the video recordings that were unlawfully usurped and used for commercial gain on the Internet.

40. In its letters to BELIEVE, WMA correctly stated the demand as follows: “Your failure to comply with the provisions of 17 U.S.C. 512 may result in liability for direct copyright infringement, since in accordance with 17 U.S.C. 512(C), any safe harbor provisions of the Digital Millennium Copyright Act (DMCA) that protect online service providers from copyright infringement liability based on the actions of their users, may not be applicable if the online service providers do not respond expeditiously to remove, or disable access to, the material that is claimed to be infringing or to be the subject of infringing activity.”

41. WMA’s warning and demand letters further stated: “Your failure to act expeditiously to remove, disable access to the infringing material located at the Infringing URLs upon notification of claimed infringement...as a result of us emailing you at the email address of your Designated Copyright Agent may result in liability for copyright infringement, the potential statutory damages for which can be as high as \$250,000 (Two Hundred and Fifty Thousand US Dollars) per work infringed, as per 17 U.S.C. 504, as well as attorney's fees.”

42. In the present instance, YOUTUBE infringes on - either directly or contributorily - the Copyright Owner's rights in forty-four (44) independent copyrighted Works, bringing a maximum potential claim of damages against you up to USD 11,000,000 (Eleven Million United States Dollars), not including attorney's fees.

43. Likewise, WMA sent numerous letters of protestation to YOUTUBE. On its end, YOUTUBE provided only partial relief and allowed limited cooperation.

44. On various occasions, WMA pointed out that the officially protected video recordings are posted on two channels. The first channel is titled: Andrey Razin <https://www.youtube.com/@andreyrazinlaskoviymay>.

45. The second official channel is titled Ласковый май <https://www.youtube.com/@LaskoviyMayOfficialChannel>.

46. WMA also demanded to close the unofficial channel, which posted the same audio material in the name of a deceased former singer at Tender May (replaced by other singers many years ago). See <https://www.youtube.com/channel/UCuIzwjfti6l3pQfpvnb8FMg> (in the name of Yuri Shatunov, Юрий Шатунов, deceased in 2022).

47. BELIEVE has ignored the warning and demands sent by WMA to BELIEVE's legal department and operating departments, with no result, leaving WMA no other remedy other than filing the present lawsuit.

COUNT I. INJUNCTION

(17 U.S. Code Chapter 5 – Copyright Infringement and Remedies).

(STATED AGAINST ALL DEFENDANTS)

48. Plaintiff incorporates by reference the allegations in the prior Paragraphs 1 to 47 and further states as follows.

49. As stated above, BELIEVE listed using YOUTUBE at <https://www.youtube.com/> the following works, infringing copyright Owner's copyrights in the Works attributed to BELIEVE:

1. https://www.youtube.com/watch?v=_VJYsPRk4fg

2. <https://www.youtube.com/watch?v=lEY9JPmcu4M>
3. <https://www.youtube.com/watch?v=dHogPsuhqxE>
4. <https://www.youtube.com/watch?v=FR-GU7g2fKA>
5. <https://www.youtube.com/watch?v=sC5x-6HxRe0>
6. https://www.youtube.com/watch?v=Em4ku-Zp8_U
7. <https://www.youtube.com/watch?v=qnSoSg3SDbo>
8. <https://www.youtube.com/watch?v=duwAzrbmwfY>
9. <https://www.youtube.com/watch?v=smW64Tc4ydE>
10. <https://www.youtube.com/watch?v=70mFzILBQtI>
11. <https://www.youtube.com/watch?v=aJkZhrFpwAc>
12. <https://www.youtube.com/watch?v=M7qh9b1nzpI>
13. <https://www.youtube.com/watch?v=QtWI8pzYF4k>
14. <https://www.youtube.com/watch?v=i-S0jmmoias>
15. https://www.youtube.com/watch?v=_i6aI7exfXw
16. <https://www.youtube.com/watch?v=vNp77hzm-bg>
17. <https://www.youtube.com/watch?v=EMoKyk80lzM&t=2s>
18. <https://www.youtube.com/watch?v=lCmuUau04Pw>
19. <https://www.youtube.com/watch?v=oCGeaWqLtZY>
20. <https://www.youtube.com/watch?v=ZHZZjQbiVvOk>
21. <https://www.youtube.com/watch?v=e5sG2FWa9EQ>
22. <https://www.youtube.com/watch?v=SCHEGETzXyg>
23. <https://www.youtube.com/watch?v=hyXMMX8wXqo>
24. <https://www.youtube.com/watch?v=kHquuYivzH4>

25. <https://www.youtube.com/watch?v=MF73YDkqtWA>
26. <https://www.youtube.com/watch?v=Yo9CQQ1FNco>
27. https://www.youtube.com/watch?v=_PwXBqjg-Pw
28. <https://www.youtube.com/watch?v=5iz-OOPjfu0>
29. <https://www.youtube.com/watch?v=5cdlwQmbyw4>
30. <https://www.youtube.com/watch?v=xMq2iTOnqBs>
31. <https://www.youtube.com/watch?v=gIvQlIebrk4>
32. <https://www.youtube.com/watch?v=CpkUFdgCIR4>
33. <https://www.youtube.com/watch?v=RHV0eB6dKeY>
34. <https://www.youtube.com/watch?v=VC3sNn0IWgU>
35. https://www.youtube.com/watch?v=yMB_-tTOB4w
36. <https://www.youtube.com/watch?v=UGxFzKEc4Ug>
37. <https://www.youtube.com/watch?v=zwGrqZMjwfY>
38. <https://www.youtube.com/watch?v=S-ggho7jcdY>
39. <https://www.youtube.com/watch?v=mHKiFYWwgc4>
40. <https://www.youtube.com/watch?v=O-lilmwaWCE>
41. <https://www.youtube.com/watch?v=4NflsW3iyiE>
42. https://www.youtube.com/watch?v=XSo9rO_ilug
43. https://www.youtube.com/watch?v=_ppI0rSx2OM
44. <https://www.youtube.com/watch?v=awOgS8mUFog>
50. The names of the songs appearing under the above links contain 01. Gray night. 02. White roses. 03. White roses. 04. Gray night. 05. White roses. 06. Pink evening. 07. Gray night. 08. Gray night. 09. Pink evening. 10. Gray night. 11. Pink evening. 12. White roses. 13. Pink evening. 14.

Gray night. 15. White roses. 16. Melting snow. 17. Cold winter evening. 18. Gray night. 19. White roses. 20. Pink evening. 21. White roses. 22. Gray night. 23. White roses. 24. Stupid snowflakes. 25. Gray night. 26. White roses. 27. Gray night. 28. White roses. 29. I am frank only with the moon. 30. Stupid snowflakes. 31. White roses. 32. Gray night. 33. White roses. 34. Gray night. 35. White roses. 36. Pink evening. 37. Autumn is slowly leaving. 38. I am frank only with the moon. 39. Summer. 40. Autumn is slowly leaving. 41. Melting snow. 42. Autumn is slowly leaving. 43. Gray night. 44. Stupid snowflakes.

51. The disclaimer is made that the above link got deactivated at a certain time as though the video material had been removed, then later reactivated again.

52. The following is a list of the URLs at which the Works, without a proper attribution who originated the postings on YOUTUBE:

1. <https://www.youtube.com/watch?v=8dS-gD7zbL0>
2. <https://www.youtube.com/watch?v=Z9Pi7yKz4ac>
3. <https://www.youtube.com/watch?v=Sr3avG3wmH0>
4. https://www.youtube.com/watch?v=GNgAP0W_RZ4
5. <https://www.youtube.com/watch?v=H3H6v-J9YKU>
6. <https://www.youtube.com/watch?v=0qN1Jlm5kUk>
7. <https://www.youtube.com/watch?v=7JIIet8pdEE>
8. <https://www.youtube.com/watch?v=bNgZoDwPdIE>
9. <https://www.youtube.com/watch?v=hhKEQ-Gdegc>
10. https://www.youtube.com/watch?v=434urDGS9_k
11. https://www.youtube.com/watch?v=xh5lND1_b9o
12. <https://www.youtube.com/watch?v=cthnB1UfjLQ>

13. <https://www.youtube.com/watch?v=Sr3avG3wmH0>
14. <https://www.youtube.com/watch?v=Y1tawvU5hsY>
15. <https://www.youtube.com/watch?v=KxUlr9XuEWc>
16. <https://www.youtube.com/watch?v=uZxWJRFIsvg>
17. <https://www.youtube.com/watch?v=TYPDLUtpN2k>
18. https://www.youtube.com/watch?v=m5_u-b2jluM
19. https://www.youtube.com/watch?v=d6rDQ_EEA2c
20. <https://www.youtube.com/watch?v=WhEhCk2nMgw>
21. <https://www.youtube.com/watch?v=yWM3-hJppms>
22. <https://www.youtube.com/watch?v=922i6xGUFdk>
23. <https://www.youtube.com/watch?v=QGheYIQqkCE>
24. https://www.youtube.com/watch?v=_QfZbVk5TQk
25. <https://www.youtube.com/watch?v=vEYtDW7YAqs>

53. As stated above, since early 2021, WMA sent to BELIEVE over ten separate warnings, objections, letters, and demands to take from its platform the video recordings that were unlawfully usurped and used for commercial gain on the Internet.

54. BELIEVE did not respond to any of those warnings and demands and continues to make commercial use of the recordings, to which WMA owns rights.

55. Relief under that Count is controlled by statute, 17 U.S. Code § 502 ‘Remedies for infringement: Injunctions.’

56. While the infringing party, BELIEVE, unlawfully posting the recordings infringing the copyright of WMA, is a French company. To aid pointing to the statutes, WMA refers to the United States statute that states:

“(a) Any court having jurisdiction of a civil action arising under this title may, subject to the provisions of section 1498 of title 28, grant temporary and final injunctions on such terms as it may deem reasonable to prevent or restrain infringement of a copyright. (b) Any such injunction may be served anywhere in the United States on the person enjoined; it shall be operative throughout the United States and shall be enforceable, by proceedings in contempt or otherwise, by any United States court having jurisdiction of that person. The clerk of the court granting the injunction shall, when requested by any other court in which enforcement of the injunction is sought, transmit promptly to the other court a certified copy of all the papers in the case on file in such clerk’s office.”

57. WMA will suffer irreparable damage unless its Court orders the injunction, as it has exhausted all avenues to resolve the violations.

58. WHEREFORE, according to the above-cited federal statute, WMA is entitled to relief allowed by the abovementioned federal statute. In this matter, WMA complains of BELIEVE infringing at least 25 works without copyright, license, or permission. By way of a precedent in a pending case in New York, WMA states a claim for infringing at least 44 works, namely at least \$11,000,000.

COUNT II. CLAIM FOR DAMAGES.

17 US. Code § 504 - Remedies for infringement. Damages and Profits).

(STATED AGAINST ALL DEFENDANTS)

59. Plaintiff incorporates by reference the allegations in Paragraphs 1 to 47 and further states as follows.

60. While the infringing party, BELIEVE, unlawfully posting the recordings infringing the copyright of WMA, is a French company, WMA points to the United States statute, as applicable, which states:

“(a) In General.—Except as otherwise provided by this title, an infringer of copyright is liable for either—

- (1) the copyright owner’s actual damages and any additional profits of the infringer, as provided by subsection (b); or
- (2) statutory damages, as provided by subsection (c).
- (b) Actual Damages and Profits.—

The copyright owner is entitled to recover the actual damages suffered by him or her as a result of the infringement, and any profits of the infringer that are attributable to the infringement and are not taken into account in computing the actual damages. In establishing the infringer's profits, the copyright owner is required to present proof only of the infringer's gross revenue, and the infringer is required to prove his or her deductible expenses and the elements of profit attributable to factors other than the copyrighted work.

(c) **Statutory Damages.**—

(1) Except as provided by clause (2) of this subsection, the copyright owner may elect, at any time before final judgment is rendered, to recover, instead of actual damages and profits, an award of statutory damages for all infringements involved in the action, with respect to any one work, for which any one infringer is liable individually, or for which any two or more infringers are liable jointly and severally, in a sum of not less than \$750 or more than \$30,000 as the court considers just. For the purposes of this subsection, all the parts of a compilation or derivative work constitute one work.

(2) In a case where the copyright owner sustains the burden of proving, and the court finds, that infringement was committed willfully, the court in its discretion may increase the award of statutory damages to a sum of not more than \$150,000. In a case where the infringer sustains the burden of proving, and the court finds, that such infringer was not aware and had no reason to believe that his or her acts constituted an infringement of copyright, the court in its discretion may reduce the award of statutory damages to a sum of not less than \$200. The court shall remit statutory damages in any case where an infringer believed and had reasonable grounds for believing that his or her use of the copyrighted work was a fair use under section 107, if the infringer was: (i) an employee or agent of a nonprofit educational institution, library, or archives acting within the scope of his or her employment who, or such institution, library, or archives itself, which infringed by reproducing the work in copies or phonorecords; or (ii) a public broadcasting entity which or a person who, as a regular part of the nonprofit activities of a public broadcasting entity (as defined in section 118(f)) infringed by performing a published nondramatic literary work or by reproducing a transmission program embodying a performance of such a work.

(3) (A) In a case of infringement, it shall be a rebuttable presumption that the infringement was committed willfully for purposes of determining relief if the violator, or a person acting in concert with the violator, knowingly provided or knowingly caused to be provided materially false contact information to a domain name registrar, domain name registry, or other domain name registration authority in registering, maintaining, or renewing a domain name used in connection with the infringement.

(B) Nothing in this paragraph limits what may be considered willful infringement under this subsection.

(C) For purposes of this paragraph, the term "domain name" has the meaning given that term in section 45 of the Act entitled "An Act to provide for the registration and protection of trademarks used in commerce, to carry out the provisions of certain international conventions, and for other purposes" approved

July 5, 1946 (commonly referred to as the “Trademark Act of 1946”; 15 U.S.C. 1127).

(d)Additional Damages in Certain Cases.—

In any case in which the court finds that a defendant proprietor of an establishment who claims as a defense that its activities were exempt under section 110(5) did not have reasonable grounds to believe that its use of a copyrighted work was exempt under such section, the plaintiff shall be entitled to, in addition to any award of damages under this section, an additional award of two times the amount of the license fee that the proprietor of the establishment concerned should have paid the plaintiff for such use during the preceding period of up to 3 years.”

61. According to the above-cited federal statute, WMA is entitled to damages and profits against BELIEVE. By way of a precedent in a pending case in New York, WMA states a claim for infringing at least 44 works for \$11,000,000.

COUNT III. CLAIM FOR COSTS AND ATTORNEY FEES.

17 U.S. Code § 505 - Remedies for infringement: Costs and attorney's fees.

(STATED AGAINST ALL DEFENDANTS)

62. Plaintiff incorporates by reference the allegations in Paragraphs 1 to 47 and further states as follows.

63. While the infringing party, BELIEVE, unlawfully posting the recordings infringing the copyright of WMA, is a French company, WMA points to the United States statute. The statute states: “In any civil action under this title, the court in its discretion may allow the recovery of full costs by or against any party other than the United States or an officer thereof. Except as otherwise provided by this title, the court may also award a reasonable attorney's fee to the prevailing party as part of the costs.”

64. WMA has undertaken costs and legal fees and continues to do so to enforce its rights against BELIEVE.

65. WHEREFORE, under the above-cited federal statute, WMA is entitled to seek costs and attorney's fees against BELIEVE. The amount of the costs and attorney's fees is continuing to grow and is to be established at the trial.

COUNT IV. ACCOUNTING.

(STATED AGAINST DEFENDANTS YOUTUBE AND GOOGLE ONLY)

66. Plaintiffs incorporate by reference the allegations in Paragraphs 1 to 47 and further state as follows.

67. By infringing copyrights, usurping the rights to post recordings, and violating the statutes in the United States, BELIEVE interfered with WMA's beneficial business relationship with Tender May and its leader and producer, Razin.

68. A total of accessing the video recordings of Tender May and Razin, representing unauthorized YOUTUBE links, may have surpassed 1 billion.

69. YOUTUBE and GOOGLE should be ordered to account for the instances of that access (up to a precision of 1,000 per URL) and the amounts that YOUTUBE, GOOGLE, and BELIEVE raised using those unauthorized links.

70. The facts stated herewith satisfy the elements for stating the claim for accounting: the elements for a breach of contract action are (1) a valid contract; (2) a material breach; and (3) damages. By accepting WMA's postings of video recordings on YOUTUBE and GOOGLE, there was a valid contract between WMA, on the one hand, and YOUTUBE and GOOGLE, on the other hand.

71. By failing or declining to enforce WMA's copyright, YOUTUBE and GOOGLE are liable to WMA, including under the cause of action for an accounting.

72. WHEREFORE, WMA is entitled to accounting by YOUTUBE, GOOGLE, and BELIEVE, necessary for ascertaining the amounts of damages.

COUNT V.

INTERFERENCE WITH BENEFICIAL BUSINESS RELATIONSHIPS.

(STATED AGAINST DEFENDANT BELIEVE ONLY)

73. Plaintiffs incorporate by reference the allegations in Paragraphs 1 to 47 and further state as follows.

74. By infringing copyrights, usurping the rights to post recordings, and violating the statutes in the United States, BELIEVE interfered with WMA's beneficial business relationship with Tender May and its leader and producer, Razin.

75. The facts stated herewith satisfy the elements of a claim for tortious interference with a contract are (1) the existence of a contract or business relation, (2) the defendant's knowledge of the contract or business relation, (3) intentional interference by the defendant with the contract or business, and (4) damage to the plaintiff as a result of the defendant's interference.

76. WHEREFORE, WMA is entitled to seek damages against BELIEVE for interference with the beneficial business relationship with Tender May and Razin. The amount of damages, separate and in addition to statutory damages, is to be established at the trial.

WHEREFORE,

Plaintiffs seek the following relief:

(a) The Court Orders to all Defendants to delete or remove the materials protected by copyright from YOUTUBE, Google, or otherwise from the Internet.

(b) Grant injunctive relief against defendant BELIEVE prohibiting BELIEVE from using or reusing the copyrighted audio and video materials on its web platform or any other Internet platforms.

(c) Award damages against BELIEVE for approximately \$11,000,000, including the estimated loss of WMA's business they targeted to be destroyed, and punitive damages.

(d) Attorney fees and costs;

(e) Any other relief that the Court will find just and proper.

EXHIBIT. Certificate of the U.S. Patent and Trademark Office.

Dated: May 22, 2023

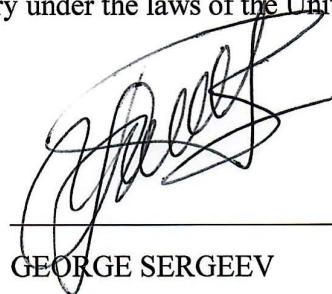
Respectfully submitted,

_____*/signed George Lambert/*
George Lambert, Esq.
The Lambert Law Firm
FL bar 1022697
421 Poinciana Drive, #1422,
Sunny Isles Beach, FL 33160;
Email: office.law.323@gmail.com
Tel. (305) 938 0600
Attorney for Plaintiff World Media Alliance Label Inc.

VERIFICATION.

I, George Sergeev, the president of the plaintiff, World Media Alliance Media Label, Inc., a Florida corporation, verify that I am familiar with the facts and that the preceding allegations are true and correct under the penalties of perjury under the laws of the United States.

Date: May 22, 2023



A handwritten signature in black ink, appearing to read "GEORGE SERGEEV", is written over a horizontal line. The signature is fluid and cursive, with a large, stylized 'G' at the beginning.

EXHIBIT 1

United States of America
United States Patent and Trademark Office

ЛАСКОВЫЙ МАЙ

Reg. No. 6,625,844

Registered Jan. 25, 2022

Int. Cl.: 9

Trademark

Principal Register

WORLD MEDIA ALLIANCE LABEL, INC. (FLORIDA CORPORATION)
16711 Collins Ave., #507
Sunny Isles Beach, FLORIDA 33160

CLASS 9: Audio and video recordings featuring music and musical performances; downloadable musical sound recordings; downloadable musical video recordings; downloadable photographs; downloadable ring tones and graphics for mobile phones and computers

FIRST USE 1-1-1986; IN COMMERCE 10-8-2013

The mark consists of Cyrillic characters.

The non-Latin characters in the mark transliterate to Laskovyi May and this means Tender May in English.

SER. NO. 90-356,475, FILED 12-03-2020



Dennis H. Hulshoff

Performing the Functions and Duties of the
Under Secretary of Commerce for Intellectual Property and
Director of the United States Patent and Trademark Office



REQUIREMENTS TO MAINTAIN YOUR FEDERAL TRADEMARK REGISTRATION

WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.

Requirements in the First Ten Years*

What and When to File:

- ***First Filing Deadline:*** You must file a Declaration of Use (or Excusable Nonuse) between the 5th and 6th years after the registration date. See 15 U.S.C. §§1058, 1141k. If the declaration is accepted, the registration will continue in force for the remainder of the ten-year period, calculated from the registration date, unless cancelled by an order of the Commissioner for Trademarks or a federal court.
- ***Second Filing Deadline:*** You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between the 9th and 10th years after the registration date.* See 15 U.S.C. §1059.

Requirements in Successive Ten-Year Periods*

What and When to File:

- You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.*

Grace Period Filings*

The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

***ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the United States Patent and Trademark Office (USPTO). The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. See 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. See 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see <http://www.wipo.int/madrid/en/>.

NOTE: Fees and requirements for maintaining registrations are subject to change. Please check the USPTO website for further information. With the exception of renewal applications for registered extensions of protection, you can file the registration maintenance documents referenced above online at <http://www.uspto.gov>.

NOTE: A courtesy e-mail reminder of USPTO maintenance filing deadlines will be sent to trademark owners/holders who authorize e-mail communication and maintain a current e-mail address with the USPTO. To ensure that e-mail is authorized and your address is current, please use the Trademark Electronic Application System (TEAS) Correspondence Address and Change of Owner Address Forms available at <http://www.uspto.gov>.

Registration #: PA0002411609
Service Request #: 1-12059682931

Mail Certificate

Lalchandani Simon PL
Daniel Jordan Simon
25 SE 2nd Avenue
Suite 1020
Miami, FL 33131 United States

Priority: Special Handling **Application Date:** December 23, 2022

Note to C.O.: Attorney for World Media Alliance Label, Inc.

Correspondent

Organization Name: Lalchandani Simon PL
Name: Daniel Jordan Simon
Email: danny@lslawpl.com
Telephone: (305)999-5291
Address: 25 SE 2nd Avenue
Suite 1020
Miami, FL 33131 United States

Registration Number

PA 2-411-609

Effective Date of Registration:

December 23, 2022

Registration Decision Date:

May 16, 2023

Copyright Registration for a Group of Works Published on the Same Album

Registration issued pursuant to 37 C.F.R. § 202.4(k)

Titles

Group Title:	Works published on the album Belie Rozy
Album Title:	Belie Rozy
• Title of Work:	Nu chto je ti, Album Track Number 6
• Title of Work:	Vse, Album Track Number 7
• Title of Work:	Medlenno uhodit osen, Album Track Number 8
• Title of Work:	Telefonniy roman, Album Track Number 9
• Title of Work:	Pust budet noch, Album Track Number 10
• Title of Work:	Vzroslie, Album Track Number 11
• Title of Work:	Mesyats iule, Album Track Number 12

Completion/Publication

Year of Completion for the Works Published on the Album:	1989
Date of First Publication for the Album:	May 22, 1995
Nation of First Publication:	Russia
Works released on a digital album:	No
Works released on a physical product:	Yes

Author

• Author:	Sergey Kuznetsov
Author Created:	Musical work(s) (with or without lyrics): All Tracks Being Registered
Citizen of:	Russia

Copyright Claimant

Copyright Claimant: World Media Alliance Label Inc.

16711 Collins Avenue, #507, Sunny Isles Beach, FL, 33160, United States

Transfer statement: This claimant obtained all of the rights in the works being registered by written agreement

Rights and Permissions

Organization Name: World Media Alliance Label Inc.

Name: George Sergeev

Email: wmalabel@gmail.com

Telephone: (786)399-0447

Address: 16711 Collins Ave.

#507

Sunny Isles Beach, Fl 33160 United States

Certification

Name: Daniel Simon, Esq.

Date: December 23, 2022

Correspondence: Yes

Copyright Office notes: Regarding group registration: A group of musical works may be registered in Class PA under 37 C.F.R. 202.4(k) if the following requirements have been met: 1) all of the musical works must be contained on the same album, as defined in 37 C.F.R. 202.4(k)(1)(i); 2) the group may include up to twenty musical works; 3) all the works in the group must be published on the same album and on the same date, all the works must be first published in the same country, and the date and nation of first publication for the album must be specified in the application; 4) the application must provide the title for the album and a title for each work in the group; 5) all the works in the group must be created by the same author, or the works must have a common joint author; 6) the copyright claimant or co-claimants for all of the works in the group must be the same person or organization; and 7) the works may be registered as works made for hire if they are identified in the application as such.

Regarding special handling request: Claim upgraded for special handling per request received on 1/13/23 due to pending or prospective litigation.

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.



United States Register of Copyrights and Director

Registration Number

PA 2-398-703

Effective Date of Registration:

February 01, 2023

Registration Decision Date:

February 27, 2023

Supplementary Registration

Supplement To: PA0002320513, 2021

Title

Title of Work: Works Published on the Album Belie Rozie

Title of Larger Work: Belie Rozie

Content Title: Belie Rozie, Album Track Number 1

Sedaya Noch, Album Track Number 2

Completion/Publication

Year of Completion: 1988

Date of 1st Publication: March 10, 1989

Nation of 1st Publication: Russia

Author

• **Author:** Andrey Razin

Author Created: Musical work(s) (with or without lyrics): All Tracks Being Registered

Work made for hire: Yes

Citizen of: Russia

• **Author:** Andrey Razin

Author Created: Musical work(s) (with or without lyrics): All Tracks Being Registered

Work made for hire: No

Citizen of: Russia

Copyright Claimant

Copyright Claimant: World Media Alliance Label Inc.

16711 Collins Ave, #507, Sunny Isles, FL, 33160, United States

Transfer statement: This claimant obtained all of the rights in the works being registered by written agreement

Rights and Permissions

Organization Name: World Media Alliance Label Inc.
Name: George Sergeev
Email: wmalabel@gmail.com
Telephone: (786)399-0447
Address: 16711 Collins Ave
#508
Sunny Isles, FL 33160 United States

Certification

Name: Daniel Simon, Authorized agent of World Media Alliance Label Inc.
Date: February 01, 2023

Copyright Office notes: Regarding information on basic registration: Consult basic registration for relevant annotations.

Explanation of Corrections: The only thing being corrected in this Registration PA 2-320-513 is the name of the Copyright Claimant from "World Media Alliance Label LLC" to "World Media Alliance Label Inc." It was accidentally entered incorrectly. All other information remains unchanged in the Registration PA 2-320-513.

Registration #: PA0002398703
Service Request #: 1-12192143002



Lalchandani Simon PL
Daniel Jordan Simon
25 SE 2nd Avenue
Suite 1020
Miami, FL 33131 United States

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

A handwritten signature of Shira Perlmutter.

United States Register of Copyrights and Director

Registration Number

PA 2-398-725

Effective Date of Registration:

February 01, 2023

Registration Decision Date:

February 27, 2023

Supplementary Registration

Supplement To: PA0002348087, 2022

Title

Title of Work: Works Published on the Album Maskarade

Title of Larger Work: Maskarade

Content Title: Taushiy sneg, Album Track Number 5

Leto, Album Track Number 6

Ya otkrovenen lish s lunoy, Album Track Number 7

Completion/Publication

Year of Completion: 1989

Date of 1st Publication: January 17, 1990

Nation of 1st Publication: Russia

Author

• **Author:** Andrey Razin

Author Created: Musical work(s) (with or without lyrics): All Tracks Being Registered

Work made for hire: Yes

Citizen of: Russia

Copyright Claimant

Copyright Claimant: World Media Alliance Label Inc.

16711 Collins Avenue, #507, Sunny Isles, FL, 33160, United States

Transfer statement: This claimant obtained all of the rights in the works being registered by written agreement

Rights and Permissions

Organization Name: World Media Alliance Label Inc.
Name: George Sergeev
Email: wmalabel@gmail.com
Telephone: (786)399-0447
Address: 16711 Collins Avenue
#507
Sunny Isles, F 33160 United States

Certification

Name: Daniel J. Simon, Authorized agent of World Media Alliance Label Inc
Date: February 01, 2023

Copyright Office notes: Regarding information on basic registration: Consult basic registration for relevant annotations.

Explanation of Corrections: The only thing being corrected in this Registration PA 2-348-087 is the name of the Copyright Claimant from "World Media Alliance LLC" to "World Media Alliance Inc." It was accidentally entered incorrectly. All other information remains unchanged in the Registration PA 2-348-087.

Registration #: PA0002398725
Service Request #: 1-12191579617



Lalchandani Simon PL
Daniel Simon
25 SE 2nd Avenue
Suite 1020
Miami, FL 33131 United States

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.



United States Register of Copyrights and Director

Registration Number

PA 2-398-714

Effective Date of Registration:

February 01, 2023

Registration Decision Date:

February 27, 2023

Supplementary Registration

Supplement To: PA0002332534, 2021

Title

Title of Work: Works Published on the Album Rozoviy Vecher

Title of Larger Work: Rozoviy Vecher

Content Title: Rozoviy Vecher, Album Track Number 1

Glupie snejinki, Album Track Number 2

Metel v chujom gorode, Album Track Number 3

Completion/Publication

Year of Completion: 1988

Date of 1st Publication: April 11, 1988

Nation of 1st Publication: Russia

Author

- Author:** Sergey Kuznetsov
- Author Created:** Musical work(s): All Tracks Being Registered
- Citizen of:** Russia

Copyright Claimant

Copyright Claimant: World Media Alliance Label Inc.
16711 Collins Avenue, #507, Sunny Isles, FL 33160, United States

Transfer statement: This claimant obtained all of the rights in the works being registered by written agreement

Limitation of copyright claim

Material excluded from this claim: lyrics

New material included in claim: music

Rights and Permissions

Organization Name: World Media Alliance Label Inc.
Name: George Sergeev
Email: wmalabel@gmail.com
Telephone: (786)399-0447
Address: 16711 Collins Avenue
#508
Sunny Isles, FL 33160 United States

Certification

Name: Daniel Simon, Authorized agent of World Media Alliance Label Inc
Date: February 01, 2023

Copyright Office notes: Regarding information on basic registration: Consult basic registration for relevant annotations.

Explanation of Corrections: The only thing being corrected in this Registration PA 2-332-534 is the name of the Copyright Claimant from "World Media Alliance Label LLC" to "World Media Alliance Label Inc." It was accidentally entered incorrectly. All other information remains unchanged in the Registration PA 2-332-534.

Registration #: PA0002398714
Service Request #: 1-12191963092



Lalchandani Simon PL
Daniel Simon
25 SE 2nd Avenue
Suite 1020
Miami, FL 33131 United States